

## REMARKS

Claims 1-26 are pending in the application. Claims 1-26 are rejected. Claims 1, 6, 7, 9, 15-24, and 26 have been amended to correct typographical errors and to provide consistency. No new claims have been added. No claims have been cancelled. Claims 1-26 remain in the case for consideration.

***Claim Rejections - 35 U.S.C. § 102***

Claims 1-26 are rejected under 35 U.S.C. § 102(b) as being anticipated by Bhatia (U.S. Patent No. 6,094,659).

With respect to claim 1, Bhatia does not teach each and every element of the invention. Bhatia fails to teach the element of dialing, on the accessed line, a public-switched-telephone-network access number for a *point-to-point HTTP server*. A point-to-point HTTP server is a server that provides point-to-point HTTP (see page 5 of the present specification.) Point-to-point HTTP is used to describe direct HTTP-like transactions between a client and a server over the PSTN *but without the necessity of an intervening packet-routing network* and networking accoutrements (see page 5 of the present specification.) Even though the point-to-point HTTP server element already includes the element of *without the necessity of an intervening packet-routing network*, the applicant has amended claim 1.

Bhatia fails to teach the element of dialing, on the accessed line, a public-switched-telephone-network access number for a *point-to-point HTTP server*. Bhatia fails to disclose this element because the remote network discussed in Bhatia col. 10 is not a point-to-point HTTP server as alleged by the Examiner in the February 9<sup>th</sup>, 2005 Office Action.

The remote network is not a point-to-point HTTP server because Bhatia indicates in col. 10, lines 28-29 that a service provider is used for the router to establish an ISDN connection with a remote network. The use of an Internet Service Provider subjects the communication to an intervening packet-routing network. The communication is subjected to an intervening packet-routing network at least as soon as the communication reaches the Internet Service Provider's gateway. One of ordinary skill in the art would know that the Internet Service Provider, by definition, offers a gateway that transfers the communication (in this case from the public switched telephone network) *to an intervening packet-routing network*. The present specification describes the disadvantage of using an intervening



packet-routing network (page 3, line 15 *et seq.*) Therefore, because Bhatia teaches the necessity of an intervening packet-routing network to access the remote network, the remote network is not a point-to-point HTTP server. Thus Bhatia fails to teach the element of dialing, on the accessed line, a public-switched-telephone-network access number for a *point-to-point HTTP server*. Bhatia fails to disclose each and every element of claims 2-6 for at least the reason that claims 2-6 are dependent on claim 1.

With regard to claim 7, Bhatia fails to disclose a point-to-point HTTP server. The servers disclosed in Bhatia fails to disclose a point-to-point HTTP server because each server disclosed in Bhatia is either 1) accessible over the PSTN but with the necessity of an intervening packet-routing network or 2) only accessible through a LAN and not by dialing a PSTN access number. Therefore, Bhatia fails to anticipate claim 7. Bhatia fails to disclose each and every element of claims 8-14 for at least the reason that claims 8-14 are dependent on claim 7.

Bhatia fails to disclose claim 15 for at least the same reason as claim 7. Bhatia fails to disclose each and every element of claim 16 for at least the reason that claim 16 is dependent on claim 7. With regard to claim 17, Bhatia fails to disclose a point-to-point HTTP service. Bhatia fails to disclose each and every element of claims 18-22 for at least the reason that claims 18-22 are dependant on claim 17. Bhatia fails to disclose claims 23-26 for at least the same reason as claim 7.

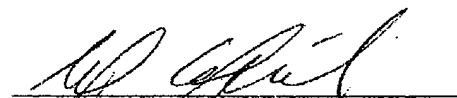


## CONCLUSION

For the foregoing reasons, reconsideration and allowance of claims 1-26 of the application as amended is solicited. The Examiner is encouraged to telephone the undersigned at (503) 222-3613 if it appears that an interview would be helpful in advancing the case.

Respectfully submitted,

MARGER JOHNSON & McCOLLOM, P.C.



Michael Coffield  
Reg. No. 54,630

MARGER JOHNSON & McCOLLOM, P.C.  
1030 SW Morrison Street  
Portland, OR 97205  
503-222-3613  
Customer No. 20575